AECOM
1255 Broad Street
Clifton
NJ, 07013
USA
aecom.com

June 1, 2020

Peter Lopez
Regional Administrator
USEPA Region 2
25th Floor
290 Broadway
New York, New York 10007-1866

RE: Self-implementing PCB Remediation
E.H. Werner Generating Station
135 Main Street, South Amboy, New Jersey
NJDEP PI Number: 009964
ISRA Numbers: E98538 & E2000058

Dear Mr. Lopez:

AECOM, on behalf of GenOn REMA LLC, conducted environmental investigations at the E.H. Werner Generating Station ("the Site" or "the Subject Property") in accordance with the New Jersey Department of Environmental Protection (NJDEP) Industrial Site Recovery Act (ISRA) and Technical Requirements for Site Remediation ("tech Rule") regulations beginning in 1998 and continuing to 2019. In December 2018, a Remedial Action Work Plan (RAWP) was submitted to NJDEP in accordance with the state regulations and guidance documents to address all identified areas of concern (AOCs). Polychlorinated biphenyls (PCBs) were analyzed for as part of some AOC investigations. Because PCBs are detected at concentrations greater than 1 milligram per kilogram (mg/kg) in soil and concrete samples at the site, the Environmental Protection Agency (EPA) self-implementing procedure is being used. Please find below, for EPA review and in accordance with 40 CFR 761.61(a) and (c), a summary of the PCB concentrations detected at the Site.

The Subject Property is considered Low Occupancy since the area is not occupied on average more than 6.7 hours per individual per week. All PCB concentrations are from non detect to 14 mg/kg, below 25 mg/kg. **In accordance with EPA self-implementing policy, these concentrations of PCBs found require a deed restriction for the low occupancy areas**. However, to comply with NJDEP regulations, engineering controls and an institutional control will be implemented at the site.

The following sections include the Section 1 Site Description; Section 2 Operation and Ownership History including the operations related to potential PCB use; Section 3 Physical Site Characteristics; Section 4 Previous Investigations including a summary of the PCB concentrations throughout the Site; Section 5 Risk-Based Sample Approval in accordance with 40 CFR 761.61(c); and Section 6 Certification in accordance with 40 CFR 761.61(a)(3)(i)(E).

1. SITE DESCRIPTION

The E.H. Werner Generating Station is located on Main Street in South Amboy, Middlesex County, New Jersey. It occupies approximately 31 acres and is bound by the Raritan Bay to the north, Main Street to the south, a firing range and various industrial properties to the east, and commercial properties to the west (Figure 1). The generating station ceased operations on October 31, 2015. The remaining structures at the subject property are located on the western portion of the property and include an electrical shop building and a materials storage building.

In addition, two substations (230 KV and 34.5 KV) owned and operated by Jersey Central Power & Light (JCP&L) are located on the south-eastern portion of the Site. Historically, the Site was used as former power plant housing a coal tower, conveyors, above ground storage tanks (ASTs), a hazardous waste storage building, 69 KV Substation, various transformers and four combustion turbine (CT) units which have been either removed or demolished from the Site. The north-eastern portion of the Site has always remained vacant and is an undeveloped beach area.

2. OPERATION AND OWNERSHIP HISTORY

2.1 Ownership History

The Subject Property was owned by Jersey Central Power & Light (GPU parent company) from 1929 until 24 November 1999 when sold to Sithe New Jersey Holdings, LLC (Sithe). On 12 May 2000, the equitable ownership of Sithe was transferred to Reliant Energy Northeast Generation, Inc. (Reliant NE). As a result, the name of Sithe was changed to Reliant NE. In May 2009, Reliant NE changed its name to RRI Energy. In April 2010, RRI Energy and Mirant Corporation merged to form GenOn Energy and subsequently, in December 2012, GenOn Energy merged with NRG Energy Inc. (NRG Energy). In December 2018, GenOn separated from NRG Energy. The ultimate parent company is now GenOn Holdings, LLC.

2.2 Historical Operations

The main operation at the Site was power generation and some structures included a power plant building, combustion units and substations. In addition, the Site included offices, maintenance buildings, storage buildings, fuel oil storage facilities, and both truck and barge fuel oil transfer facilities. Portions of the Site was also leased to various firms over the course of the site history. These leases and operations are described in the following sections and summarized in the table below.

Name	Status (owner/lessee/operator)	From	To
Jersey Central Power and Light	Owner/operator of the Generating Station	1929	1996
American Agricultural Chemical Company	Leased/operator of a portion of the Property	1929	1955
First Energy	Leased/operator of a portion of the Property for a Substation	Prior to 1972	Present
GPU	Owner/operator of the Generating Station	1996	1999
Sithe	Owner/operator of the Generating Station	1999	2000
Reliant Energy New Jersey Holdings	Owner/operator of the Generating Station	2000	2009
Sea Streak	Leased/operator of ferry service	2002	2005
New York Water Taxi	Leased/operator of ferry service	2005	2006
RRI Energy	Owner/operator of the Generating Station	2009	2010
GenOn Energy	Owner/operator of the Generating Station	2010	2012
NRG Energy Inc.	Owner/operator of the Generating Station	2012	2018
GenOn REMA LLC	Owner/operator of the Generating Station	2018	Present

2.2.1 Power Plant Building

Operations at the Site began in 1929 and originally consisted of three coal-fired boilers and two combustion turbines (CTs) located inside the Power Plant building (Figure 2). An additional coal-fired boiler and CT were added in 1952. In 1969, the station converted from burning coal to low sulfur No. 6 fuel oil. These original steam boilers and CTs were gradually retired from service with the last unit closed on August 7, 1996 and retired on September 30, 1996. The steam units were retired in place and the building that housed the units as well as various support buildings were present at the Site until August 2014. During the years 2014 and 2015, the equipment and building were dismantled and demolished, and disposed of off-site. The building was serviced by an intake canal from the Raritan Bay to the west side of the building and a discharge canal from the east side of the building to the Raritan Bay. The floor drains from the station discharged from a sump to the discharge canal and were monitored under the New Jersey Pollutant Discharge Elimination System (NJPDES) Discharge to Surface Water (DSW) permit. The discharge canal is no longer in use and is currently closed to off-site water bodies by accumulated sediment that covers the outfall.

2.2.2 Combustion Turbine Units

In 1972, four 54 megawatt (MW) No. 2 fuel oil-fired combustion turbines located outside and east of the Power Plant Building, were installed to replace original CTs installed in 1929 and 1952 located within the Power Plant (Figure 2). These CT Units were deactivated in 2015 and were removed from the Site in July/August 2019.

2.2.3 Substations

A 230 kV Substation, 69 kV Substation, and a 34.5 kV Substation are also located at the Site (Figure 2). The 69 kV Substation is no longer operational although remnant structures remain at the Site . The 230 kV and 34.5 kV Substations are still operational which are owned and operated by JCP&L.

2.2.4 American Agricultural Chemical Company

American Agricultural Chemical Company (AAC Company), historically located at the extreme northeast corner of the site (Figure 2), began operating on-site between 1930 and 1940. The AAC Company ceased operations circa 1955. The main fertilizer processing buildings were removed circa 1960, but a washroom building remained until 1994. The sole remaining feature of the AAC buildings on-site is a concrete pad approximately 40-feet by 170-feet along the northeastern edge of the Site. An air reactive substance (i.e., material that spontaneously flamed and smoked, white phosphorus) associated with historical operations at the AAC Company was encountered and delineated as part of this investigation. This portion of the Site was transferred to South Amboy Redevelopment Agency (SARA) and the City of South Amboy (City) as discussed below as part of a settlement agreement.

On February 23, 2017, NRG REMA LLC (NRG) entered into a Settlement Agreement and Release (Agreement) with South Amboy Redevelopment Agency (SARA) and the City of South Amboy (City). As a result of the Agreement, NRG agreed to transfer two acres of property to SARA. The two-acre property is located at the east corner of the property and identified as SARA Subdivision Lot 26.02. It was understood and acknowledged by all parties that conveyance of the property may require approvals under the ISRA due to the former operations

and activities at the Werner site. However, in accordance with the agreement, NRG shall not be obligated whatsoever to perform, or pay the costs of, any environmental studies, investigations, tests or remediation activities on the Settlement Property. SARA shall assume any and all obligations related to bringing the Settlement Property into compliance with ISRA. As a result, four areas of concern (AOC) previously investigated and listed below are not be addressed in this Self-implementing PCB Remediation.

- AOC 19A – Surface Impoundment Discharge
- AOC 24 – Debris Piles - East Portion of the Site
- AOC 26 – American Agricultural Chemical Company
- AOC 27 – Historic Fill

2.2.5 Sea Streak

In 2001, Reliant leased northwest corner of the Site (Figure 2), between the fuel oil barge unloading station and the intake canal to Sea Streak America, Inc. (Sea Streak). In 2002, Sea Streak established a ferry service from the Site across the Raritan Bay to New York City. The ferryboat docked in the northwest corner of the Site. A trailer was installed adjacent to the ferry dock to serve as the ticket office. Parking for ferry customers was available on the western and northwestern edges of the Site. With Reliant's approval, Sea Streak removed the Maintenance Shop Locker Room located in this part of the Site to increase the parking area. (Aboveground building features were removed; the concrete foundation remains.) Beginning November 14, 2005, ferry operations at the Site were no longer conducted by Sea Streak but were taken over by New York Water Taxi, which ceased operating ferry service from the Site in 2006.

Portions of the Site associated with the former ferry service were accessible. The remainder of the Site (including the former Power Plant Building, CT units, fuel oil storage tanks, truck and barge fuel unloading areas, substations, and the remaining maintenance and storage buildings) were secured by chain-link fencing and locked gates. Although located in the middle of the former ferry parking area, a chlorine building and intake canal were also secured by chain-link fencing.

2.3 PCB Use At The Site

As part of the historical operations, hydraulic oil, dielectric fluid, dielectric mineral oil and transformer oil was used at the site with the potential to contain PCBs. These oils were used in the former CT area (AOC 22), Substation (AOC 14L), and former Power Plant Building (AOC 20). The oils were used in electrical transformers (AOC 14A through 14N, except AOC 14L) located in the CT Substation and power plant areas. The oils when not in use were stored away from the elements within the Graver house (AOC 7A) (Figure 2).

2.4 Future Site Use

The future use of the Site includes non-residential operations. In accordance with 40 CFR 761.61(a)(8) and NJDEP Administrative Requirements for the Remediation of Contaminated Sites (ARRCS) Rules, a Deed Notice/Restriction will be implemented. A deed notice/restriction will be prepared for the entire site since soils and historic fill exceed the applicable NJDEP Residential Direct Contact (RDC) or Non-Residential Direct Contact Soil Remediation Standards (NRDC SRS); and the site will be used as non-residential use and some areas will be designated as low occupancy areas. The deed notice/restriction will be recorded in accordance with N.J.A.C. 7:26C and E, and 40 CFR 761.61(a)(8) . Inspections will be performed to ensure that land use is consistent with the non-residential land use incorporated into the final

remediation remedy. Biennial certifications pursuant to Section 7:26C-7.8 of the ARRCS will be filed to document compliance with the Tech Rule.

3. PHYSICAL SITE CHARACTERISTICS

3.1 Site Topography

According to the 2014 United States Geological Survey (USGS) 7.5-minute quadrangle topographic map for South Amboy, the Site is generally flat with a gentle slope to the north northeast towards the Raritan Bay. The Site is located at New Jersey State Plane X and Y Coordinates 552941 and 603653, respectively. The Site is located at an elevation of approximately 10 feet above mean sea level (msl).

3.2 Geology

The Site is underlain by Quaternary Deposits including Wisconsin Glacial Till and the Columbiana Group (including the Cape May Formation, the Pennsauken Formation, and the Bridgetown Formation). These units consist of an unstratified mix of clay; silt and sand with a mix of rock material ranging from pebbles to boulders; surficial silts, sands and quartz-rich gravels; mixed detritus (eroded from older glacial material and exposed Coastal Plain formations); and deeply weathered mix of silt, sand, and gravel.

The Quaternary deposits are underlain by the Cohansey Sand Tertiary Unit. The formation consists of medium to coarse-grained arkosic quartz sand, with thin clay lenses and quartz and quartzite pebble conglomerate.

Late Cretaceous Units, including the Tilton Formation, the Mt. Laurel Formation, the Wenonah Formation, the Merchantville Formation, the Magothy Formation, and the Raritan Formation underlie the Cohansey Sand. These formations consist of glauconitic quartz sand which is locally clay-rich and silty; micaceous, glauconitic sand which is locally cross-bedded micaceous quartz and silt and is rich in organic material (mostly silt-sized lignite fragments) and pyrite (in very fresh exposures); and clay, sand, lignite, and gravels.

3.3 Site Soils

According to the Soil Conservation Survey of Middlesex County, New Jersey, the soils at the Site are classified as Urban Land, which consists of areas where more than 80 percent of the surface is covered by industrial plants, shopping and business centers, and other structures. Most areas are nearly level to moderately sloping. Soils encountered during the subsurface sampling programs consisted of fill and native material underlying the fill. Fill material at the site consists of orange and grey fine to medium sand and may include wood, boiler slag, and bottom ash, and is found at the surface to approximately 4 feet below the ground surface (ft bgs) to 13 ft bgs. Underlying the fill material is native material, consisting of sands and silts with varying amounts of gravel and clay and of clay with varying amounts of sand, silt and shell fragments.

3.4 Historic Fill

The NJDEP Land Use Management New Jersey Geological Survey, Historic Fill of the South Amboy Quadrangle, Historic Fill Map (Exhibit 1 below), depicts the entire site within the boundaries of historic fill. Historic fill material is mixed with the Werner Generating Station coal fired by-product (i.e., boiler slag, bottom ash). The fill material and site by-product present a similar profile of detected analytical compounds.

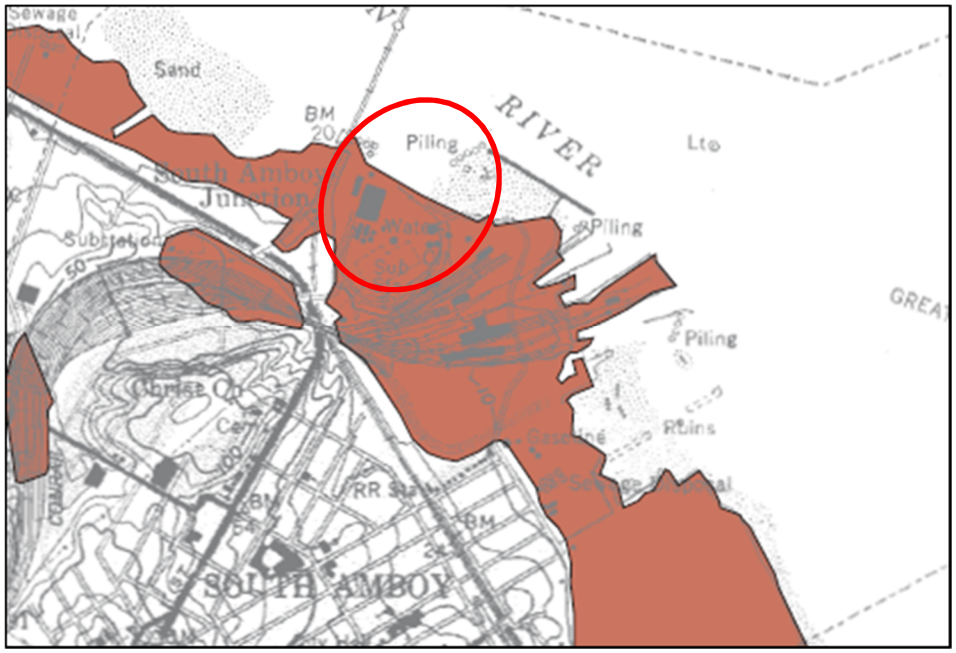


Exhibit 1
Source: 2004 Historic Fill of South Amboy Quadrangle
New Jersey Geological Survey

3.5 Hydrogeologic Setting

Based on site information obtained during the investigation, the depth to groundwater at the site is generally less than 5 ft bgs . The direction of groundwater flow is expected to be to the water body to the northeast. Therefore, it is expected that shallow groundwater flow would be to the Raritan Bay. Because of its location along the Raritan Bay, it is likely that shallow groundwater levels are tidally influenced, particularly near the site perimeter.

3.6 Conceptual Site Model

Key elements of the conceptual model for the Site are as follows:

- The Site is underlain by historic fill, organic materials, and silts.
- Shallow groundwater is approximately encountered at 2 ft bgs to 10 ft bgs.
- Constituents of concern in soil are primarily polynuclear aromatic hydrocarbons (PAHs), and inorganics.
- Groundwater flow direction is expected to be towards Raritan Bay which is to the north, northeast with tidal influence.
- Potential receptors include Site workers, construction workers, and any flora and fauna associated with Raritan Bay.

4. PREVIOUS INVESTIGATIONS

There is currently an on-going ISRA investigation that was triggered in 1998. The following investigations were conducted to comply with requirements of ISRA in effect at the time. The results of these previous investigations were presented in reports submitted to the NJDEP to date:

- Preliminary Assessment – conducted from December 1997 through June 1998 by URS. The Preliminary Assessment Report (PAR) dated June 1998 was submitted to the NJDEP on August 11, 1998.
- Phase II Investigation – conducted from May through July 1998 by URS. The Report of Phase II Investigation dated July 1998 was submitted to the NJDEP on January 12, 1999.
- PAR updated by URS in December 1999. Results of the PAR update were submitted to NJDEP on December 7, 1999.
- Site Investigation – conducted during March 2000. The Site Investigation Report dated May 22, 2000 was subsequently submitted to the NJDEP.
- Remedial Investigation – conducted August 2002 and March 2003. The Remedial Investigation Report dated May 15, 2003 was subsequently submitted to the NJDEP.
- In 2006, URS prepared a report titled Munitions and Explosives of Concern (MEC) Site Assessment and the report was submitted to the NJDEP.
- Soil Remedial Action Workplan – prepared prior to December 2008 using data obtained from previous investigations and submitted to NJDEP by December 1, 2008.
- Supplemental Remedial Investigation Report submitted to NJDEP on May 6, 2016– prepared using data from previous investigation and soil and groundwater collected in 2012, 2013 and 2016.
- Remedial Action Work Plan prepared by AECOM (formerly URS) dated December 2018.

Site characterization was conducted in accordance with NJDEP Technical Requirements for Site Remediation (N.J.A.C. 7:26E). A total of 496 soil samples, and 30 concrete chip samples were collected and analyzed for PCBs as part of the 1998 Phase II Site Investigation, 2000 Site Investigation, 2002 and 2003 Remedial Investigations, 2016 and 2017 Supplemental Remedial Investigations and on-going remedial investigations. Sample locations were biased to areas of concern (AOCs) and only about 4% of the soil samples analyzed for PCBs had concentrations above the EPA self-implementing cleanup levels (i.e., greater than 1 mg/kg and less than 25 mg/kg).

4.1 Summary of the Sampling Procedures

All samples were collected in accordance with site specific Sampling Plans and Quality Assurance Project Plans prepared in accordance with NJDEP Regulations and Guidance Documents. Shallow soil samples were collected using hand auger techniques and subsurface soil samples were collected using a Geoprobe drill rig operated by a New Jersey licensed driller. Concrete chip samples were collected in accordance with the New Jersey Field Sampling Procedures Manual using a decontaminated chisel, a dedicated natural bristle brush and a dust pan lined with aluminum foil. Soil and concrete chip samples were placed in laboratory prepared glassware and sent to TestAmerica/Eurofins, a New Jersey Certified laboratory, under Chain of Custody protocol.

The characterization sampling, described in the above paragraph, was not sampled on a 10 foot grid which is in accordance with 40 CFR 761 Subpart N. Sample points were carefully chosen and were biased to areas of concern based on site history, manufacturing processes, personnel practices, obvious contamination and available surface area. As part of the NJDEP ISRA investigation, each PCB detected sample was delineated vertically and horizontally in accordance with NJDEP regulations and guidelines.

All PCB extraction and analysis prior to 2018 was conducted in accordance with NJDEP requirements. Subpart N characterization requirements and Subpart Q alternative extraction criteria were not implemented. For example, the sample preparation method was microwave extraction EPA SW-846 Method 3546 and was analyzed in accordance with EPA SW-846 Method 8082. All future characterization and analysis of PCBs, if needed, will be in accordance with 40 CFR 761.61 Subpart N.

After 2018, samples analyzed for PCBs Method 8082A were prepared with Liquid-Liquid Extraction (Separatory Funnel; EPA Method 3510C) and Automated Soxhlet Extraction (EPA Method 3541).

4.2 Summary of PCB Analytical Results and NJDEP PCB Remediation Plan

Approximately 496 soil samples, and 30 concrete chip samples were collected from 1998 to 2019 and analyzed for PCBs. A summary of the soil and concrete chip sample results for PCB concentrations measured in all pre-cleanup characterization samples (as well as sample collection and analysis dates) is presented in Table 1 in accordance 40 CFR § 761.61(a)(3)(i)(B). A site map showing the PCB sampling locations (Figure 2, 2A and 2B) cross referenced to the sample identification numbers is provided as part of the characterization information in accordance with 40 CFR § 761.61(a)(3)(i)(C). All PCB concentrations are below 25 mg/kg (or ppm) and are in areas that are considered Low Occupancy since the areas are not occupied on average more than 6.7 hours per individual per week. In accordance with EPA self-implementing policy, these concentrations of PCBs found require a deed restriction for the low occupancy areas. However, remediation is required for concentrations greater than the NJDEP Residential Direct Contact (RDC) SRS of 0.2 mg/kg; therefore, in accordance with NJDEP regulations, engineering and institutional controls will be used at the site as part of the final environmental remediation as discussed below.

4.2.1 Surface Soil PCB Results

As summarized in Exhibit 2 below, 14 out of 187 soil samples collected in the top two feet of soil had PCBs detected above 1 mg/kg with concentrations ranging from 1.69 mg/kg to 14 mg/kg. In accordance with EPA self-implementing policy, a deed restriction for the low occupancy areas is permitted at these concentrations in the top two feet of soil.

In accordance with NJDEP guidance, demonstration of compliance with NJDEP NRD SRS of 1 mg/kg for PCBs in the top two feet of soil was achieved through computation of a spatially weighted average of PCB concentrations; therefore, an institutional control (i.e., Deed Notice/Restriction) will be implemented before the NJDEP remediation deadline of March 6, 2021 to restrict Site use to non-residential.

Exhibit 2
Summary of Surface Soil PCB Results above 1 mg/kg

Sample ID	Date	PCB mg/kg
SS-11-4	15-Aug-02	1.7
S14A5A	20-Mar-00	3.85
SS-14G-2A	16-Mar-00	2.1
SS-1K-5A	21-Aug-02	7.2
SS-1K-6A	21-Aug-02	2.3
SS-1M1-3A	14-Aug-02	1.6
SS-1M1-7	14-Aug-02	4.1

Sample ID	Date	PCB mg/kg
SS-1M2-7	15-Aug-02	3.2
SS-1M2-8	15-Aug-02	2.6
SS-1M3-2A	15-Aug-02	14
SS-1M3-7	15-Aug-02	2.1
SS-1M4-1B(0-0.5)	28-Sep-12	4.6
SS-1M2-4B	23-Aug-02	7.4
SS-1M2-2A	23-Aug-02	3.2

4.2.2 Subsurface Soil PCB Results

With regard to deeper soil, only five (Exhibit 3) out of 309 soil samples collected within the subsurface soil from 2-ft bgs to 20 ft bgs had concentrations above 1 mg/kg, as summarized below. In accordance with EPA self-implementing policy, a deed restriction for the low occupancy areas is permitted in the subsurface soil.

Exhibit 3
Summary of Subsurface Soil PCB Results above 1 mg/kg

Sample ID	Date	PCB mg/kg
SB-5-1A	16-Sep-02	7.99
SSDUP2	21-May-98	6.85
SB12A2	21-May-98	4.1
SB12A3	21-May-98	3.1
SB-12A-8A	09-Sep-02	3

In addition, remedial action to comply with NJDEP regulations requiring remediation of concentrations of PCBs above 1 mg/kg include:

- An engineering control that includes two feet of existing soil cover, existing buildings, existing building foundations and asphalt roads and parking areas that limit direct contact to the subsurface soil (i.e., 2 ft bgs to 20 ft bgs); and
- An institutional control (i.e., Deed Notice/Restriction) to ensure the engineering controls remain in place to be protective of human health and the environment. As discussed above, the Institutional Control will be implemented before the NJDEP remediation deadline of March 6, 2021.

4.2.3 Concrete Chip PCB Results

Seven (Exhibit 4) out of 30 concrete chip samples collected from stained areas found on the former plant foundation and former CT Units foundations had concentrations above 1 mg/kg, as summarized below (see Figure 3 attached). In accordance with EPA self-implementing policy the concentrations in this area are acceptable for unrestricted use.

Exhibit 4
Summary of Concrete Chip PCB Results above 1 mg/kg

Sample ID	Date	PCB mg/kg
CS-3	26-Sep-16	2.5
CS-4	26-Sep-16	10
CS-9	26-Sep-16	2.4
CS-22-9	10/30/2019	1.6
CS-22-12	10/30/2019	1.6
CS-22-14	10/30/2019	2.2
CS-22-19	10/31/2019	1.1

However, in accordance with NJDEP regulations, remediation is required. Demonstration of compliance with NJDEP NRDC SRS for PCBs was attained in the CT Area using spatially weighted averages. The remediation for the former plant foundation consists of:

- An engineering control to restrict access. The engineering control in this area is an eight foot high chain-link fence and warning signs to restrict access to the former foundation concrete slab. The fence was installed during July 2019.

5. RISK-BASED SAMPLE APPROVAL IN ACCORDANCE WITH 40 CFR 761.61(c)

With this letter, AECOM and GenOn REMA LLC is requesting that EPA approve the sampling characterization techniques used as described in Section 4.1 above. Characterization sampling was not performed in accordance with 40 CFR 761 Subpart N (e.g., sampling on a 10 foot grid). Sample points were carefully chosen and were biased to areas of concern based on site history, manufacturing processes, personnel practices, obvious contamination and available surface area. As part of the NJDEP ISRA investigation, each PCB detected sample was delineated vertically and horizontally in accordance with NJDEP regulations and guidelines.

The samples analyzed for PCBs Method 8082A were not prepared with Liquid-Liquid Extraction (Separatory Funnel; EPA Method 3510C) and Automated Soxhlet Extraction (EPA Method 3541).The sample preparation method was microwave extraction EPA SW-846 Method 3546 and was analyzed in accordance with EPA SW-846 Method 8082.

6. CERTIFICATION IN ACCORDANCE WITH 40 CFR 761.61(a)(3)(i)(E)

This letter serves as written certification that all sampling plans, sample collection procedures, sample preparation procedures, extraction procedures, and instrumental / chemical analysis procedures used to assess or characterize the PCB contamination at the cleanup site, are on file at AECOM, Suite 201, 1255 Broad Street, in Clifton, New Jersey, and are available for EPA inspection.

-oOo-

Please contact Cathy Bryant, the New Jersey Licensed Site Remediation Professional (LSRP) for the site, with any questions or concerns.

Sincerely,

Cathy Bryant, LSRP
Senior Site Remediation Professional
AECOM
T: 973-883-8546
E: cathy.bryant@aecom.com

Neil MacIntosh
Plant Manager, Werner Station
NRG REMA LLC
T: 908-995-6922
E: Neil.MacIntosh@genon.com

cc: David Cramer, GenOn
Benny Conetta, EPA (conetta.benny@epa.gov)

TABLE 1
Summary of PCB Analytical Results

EPA PCB Self Implementing Plan
Werner Generating Station
South Amboy, New Jersey

AOC	AOC-ID - Description	Matrix	Sample ID	Sample Date	Sample Depth		Result
AOCs-1A/1K	Gasoline Storage Tank (Tank 1) and Kerosene Tank (Tank 15) and Support Area	soil	SS-1K-5	8/21/02	1	1.5	7.2
				8/21/02	10	10.5	0.27
			SS-1K-6	8/21/02	1	1.5	2.3
				8/21/02	15	15.5	0.012 U
				9/25/12	3.5	4	1.3
				9/25/12	11.5	12	0.062 U
			SS-1K-7	8/21/02	1	1.5	0.012
				8/21/02	5	5.5	0.017 U
			SS-1K-8A	8/22/02	1	1.5	1.1
				8/22/02	4	4.5	0.24
				9/26/12	4.5	5	0.049 U
				9/26/12	6.5	7	0.047 U
			SS2-1K-9	5/10/13	0	0.5	0.85
				5/10/13	4	4.5	0.029 U
				5/10/13	9.5	10	0.032 U
			SS2-1K-10	5/10/13	0	0.5	0.021
				5/10/13	4	4.5	0.022 U
				5/10/13	9.5	10	0.032 U
			SS2-1K-11	5/10/13	0	0.5	0.021
				5/10/13	4	4.5	0.027 U
				5/10/13	9.5	10	0.031 U
			SS2-1K-12	5/8/13	0	0.5	0.021
				5/8/13	4	4.5	0.023 U
				5/8/13	9.5	10	0.032 U
			SS2-1K-13	5/8/13	0	0.5	0.022
				5/8/13	4	4.5	0.023 U
				5/8/13	9.5	10	0.03 U
			SS2-1K-14	5/10/13	0	0.5	0.022
				5/10/13	4	4.5	0.022 U
				5/10/13	9.5	10	0.031 U
			SS2-1K-15	5/9/13	0	0.5	0.021
				5/9/13	4	4.5	0.023 U
				5/9/13	9.5	10	0.033 U
AOC-1F	Transformer Oil Storage Tank	soil	SB-1F-1	5/20/98	0	0.5	0.305
				5/20/98	2	2.5	0.1
			SS-1F-2A	3/21/00	0	0.5	0.093
AOC-1M	CT Area	soil	SB-1M-1B	10/9/12	4.5	5	0.018 U
AOC-1M1	Lube Oil Tanks CT Unit #1	soil	SS-1M1-1ADL	3/27/03	1	1.5	0.73
			SS-1M1-1B	3/22/00	4.5	5	0 U
			SS-1M1-3	8/14/02	2	2.5	1.6
				9/27/12	3.5	4	0.2
				9/27/12	4.5	5	0.19
			SS-1M1-7	8/14/02	1	1.5	4.1
				9/27/12	3.5	4	0.71
			SS-1M1-8	8/14/02	1	1.5	0.51
				9/27/12	3.5	4	0.045 U
			SS-1M1-9	9/5/02	4	4.5	0.02
				9/5/02	6	6.5	0.012 U
AOC-1M2	Lube Oil Tanks CT Unit #2	soil	SS-1M2-1B	3/22/00	4	4.5	0.43
			SS-1M2-2	8/23/02	2	2.5	3.2
				9/27/12	3.5	4	0.046 U
			SS-1M2-4B	8/23/02	2	2.5	7.4
			SS-1M2-7	8/15/02	1	1.5	3.2
			SS-1M2-8	8/15/02	1	1.5	2.6
			SS-1M2-9	9/5/02	1	1.5	0.1
				9/5/02	5	5.5	0.02
AOC-1M3	Lube Oil Tanks CT Unit #3	soil	SS-1M3-1	3/22/00	4	4.5	1.13
				9/27/12	7	7.5	0.054 U
			SS-1M3-2	8/15/02	2	2.5	14
			SS-1M3-7	8/15/02	1	1.5	2.1
				9/28/12	3.5	4	0.05 U
			SS-1M3-8	8/15/02	1	1.5	1
				9/28/12	3.5	4	0.051 U
			SS-1M3-9	9/5/02	2	2.5	0.023
				9/5/02	5	5.5	0.015 U
AOC-1M4	Lube Oil Tanks CT Unit #4	soil	SS-1M4-1	3/22/00	4	4.5	0.72
				9/28/12	0	0.5	4.6
				9/28/12	7	7.5	0.049
			SS-1M4-2	9/28/12	1.5	2	0.084
				9/28/12	3.5	4	0.093
			SS-1M4-7	8/15/02	1	1.5	0.3
AOC-1M5	Piping in Vaults at CTs	soil	SS-1M5-1B	3/22/00	7	7.5	0 U
			SS-1M5-2B	3/22/00	7	7.5	0 U
			SS-1M5-4B	3/22/00	7	7.5	0 U
			SS-1M5-5B	3/22/00	7	7.5	0 U
			SS-1M5-6B	3/22/00	7	7.5	0 U
			SS-1M5-7B	3/22/00	7	7.5	0.32
			SS-1M5-8B	3/22/00	7	7.5	0 U

TABLE 1
Summary of PCB Analytical Results

EPA PCB Self Implementing Plan
Werner Generating Station
South Amboy, New Jersey

AOC	AOC-ID - Description	Matrix	Sample ID	Sample Date	Sample Depth		Result
AOC-1M, 1AOC-1M2, AOC-1M3, AOC-1M4, AOC-14A, AOC-14B and AOC-14D	CT Area	soil	SB2-CT-8	8/9/13	0	0.5	0.022
				8/9/13	3.5	4	0.027 U
				8/9/13	7	7.5	0.027 U
			SS2-CT-1	5/3/13	0	0.5	0.021
				5/3/13	3.5	4	0.021 U
				5/3/13	7	7.5	0.027 U
			SS2-CT-2	5/3/13	0	0.5	0.02
				5/3/13	3.5	4	0.028 U
				5/3/13	7	7.5	0.029 U
			SS2-CT-3	5/3/13	0	0.5	0.02
				5/3/13	3.5	4	0.022 U
				5/3/13	7	7.5	0.027 U
			SS2-CT-4A	5/3/13	0	0.5	0.021
				5/3/13	3.5	4	0.022 U
				5/3/13	7	7.5	0.028 U
			SS2-CT-5	5/6/13	0	0.5	0.026
				5/6/13	3.5	4	0.026 U
				5/6/13	7	7.5	0.028 U
			SS2-CT-6	5/6/13	0	0.5	0.021
				5/6/13	3.5	4	0.024 U
				5/6/13	7	7.5	0.02 U
			SS2-CT-7	5/6/13	0	0.5	0.025
				5/6/13	3.5	4	0.029 U
				5/6/13	7	7.5	0.03 U
			SS2-CT-9	5/6/13	0	0.5	0.021
				5/6/13	3.5	4	0.023 U
				5/6/13	7	7.5	0.029 U
			SS2-CT-10	5/3/13	0	0.5	0.021
				5/3/13	3.5	4	0.027 U
				5/3/13	7	7.5	0.03 U
			SS2-CT-11	5/3/13	0	0.5	0.021
				5/3/13	3.5	4	0.022 U
				5/3/13	7	7.5	0.028 U
AOC-3	Railroad Siding	soil	SB-3-1	10/11/12	0	0.5	0.118
			SS-3-2B	10/3/12	1.5	2	0.24
			SS-3-3A	10/3/12	0	0.5	0.021
			SS-3-4A	10/3/12	0	0.5	0.184
			SS-3-5A	10/3/12	0	0.5	0.044
			SS-3-6A	10/3/12	0	0.5	0.016
AOC-5	Sump - Power Plant	soil	SB2-5-6	4/30/13	3.5	4	0.022 U
				4/30/13	6	6.5	0.025 U
				4/30/13	9	9.5	0.025 U
			SB2-5-7	4/30/13	3.5	4	0.02 U
				4/30/13	6	6.5	0.023 U
				4/30/13	9	9.5	0.03 U
			SB2-5-8A	4/30/13	3.5	4	0.021 U
				4/30/13	6	6.5	0.023 U
				4/30/13	9	9.5	0.021 U
			SB2-5-9A	4/30/13	3.5	4	0.021 U
			SB-5-1	9/16/02	4	4.5	7.99
				9/16/02	4	4.5	1.061
				9/16/02	4	4.5	0
				9/16/02	12	12.5	0.015 U
				10/9/12	3.5	4	0.017 U
				10/9/12	6	6.5	0.02 U
				10/9/12	9	9.5	0.018 U
			SB-5-2	9/16/02	12	12.5	0.016 U
			SB-5-3	9/16/02	12	12.5	0.018 U
			SB-5-4	9/16/02	12	12.5	0.015 U
			SB-5-5	9/16/02	11	11.5	0.014 U
				9/16/02	12	12.5	0.012 U
AOC-7C	**Former Waste Storage Area**	soil	SS-7 C-1	9/25/12	0	0.5	0.33
				9/25/12	5.5	6	0.13
				9/25/12	3.5	4	0.391
			SS-7C-2	9/26/12	3.5	4	0.44
				9/26/12	1	1.5	0.099
			SS-7C-3	3/22/00	0	0.5	0.15
				9/26/12	3.5	4	0.042 U
			SS-7C-4A	8/16/02	1		0.191
			SS-7C-5	9/26/12	3.5	4	0.045 U
				9/26/12	1	1.5	0.211

TABLE 1
Summary of PCB Analytical Results

EPA PCB Self Implementing Plan
Werner Generating Station
South Amboy, New Jersey

AOC	AOC-ID - Description	Matrix	Sample ID	Sample Date	Sample Depth		Result
AOC-10	Storm Sewers	soil	SB-230-2A	10/10/12	8	8.5	0.024 U
			SB-230-3	10/17/12	2.5	3	0.023 U
				10/17/12	5.5	6	0.023 U
			SB-230-4	10/11/12	1.5	2	0.017
				10/11/12	4	4.5	0.018 U
			SB-MS-1	10/9/12	1	1.5	0.017
				10/9/12	5.5	6	0.018 U
			SB-MS-4	10/11/12	1	1.5	0.018
				10/11/12	3.5	4	0.1
			SB-PP-11	10/11/12	1	1.5	0.116
				10/11/12	3.5	4	0.019 U
			SB-PP-9A	10/11/12	8.5	9	0.018 U
				10/11/12	11.5	12	0.02 U
AOC-11	Storm Water Detention Area	soil	SB-11-1	9/16/02	4	4.5	0.012 U
			SB-11-2	10/15/12	3.5	4	0.018 U
				10/15/12	5	5.5	0.14
				10/15/12	7	7.5	0.023 U
			SED-11-1	10/1/12	3.5	4	0.016 U
				10/1/12	4	4.5	0.022 U
			SS-11-1	8/15/02	1	1.5	0.13
			SS-11-2	8/15/02	1	1.5	0.89
				10/1/12	3.5	4	0.019 U
				10/1/12	4	4.5	0.062
			SS-11-3	8/15/02	1	1.5	0.68
				10/1/12	3.5	4	0.19
				10/1/12	4.5	5	0.076
			SS-11-4	8/15/02	1	1.5	1.7
				10/1/12	3.5	4	0.41
				10/1/12	4.5	5	0.53
				10/1/12	7.5	8	0.24
				10/18/12	7.5	8	0.02 U
			WFA-2	5/6/13	0	0.5	0.021
				5/6/13	3.5	4	0.022 U
				5/6/13	7.5	8	0.024 U
				5/6/13	11	11.5	0.03 U
			WFA-4	5/7/13	0	0.5	0.56
				5/7/13	3.5	4	0.027 U
				5/7/13	7.5	8	0.023 U
				5/7/13	11	11.5	0.027 U
			WFA-5	5/7/13	0	0.5	0.58
				5/7/13	3.5	4	0.022 U
				5/7/13	7.5	8	0.027 U
				5/7/13	11	11.5	0.03 U
				5/7/13	17	17.5	0.029 U
			WFA-6	5/7/13	0	0.5	0.021
				5/7/13	3.5	4	0.15
				5/7/13	7.5	8	0.022 U
				5/7/13	11	11.5	0.022 U
				5/7/13	17	17.5	0.029 U
			WFA-7	5/10/13	0	0.5	0.022
				5/10/13	3.5	4	0.022 U
				5/10/13	7.5	8	0.023 U
				5/10/13	11	11.5	0.024 U
				5/10/13	17	17.5	0.03 U
				5/10/13	19	19.5	0.029 U
			WFA-8	4/30/13	0	0.5	0.032
				4/30/13	3	3.5	0.1
				4/30/13	7.5	8	0.023 U
				4/30/13	11	11.5	0.022 U
				4/30/13	17	17.5	0.03 U
			WFA-13	4/30/13	0	0.5	0.02
				4/30/13	3	3.5	0.134
				4/30/13	7.5	8	0.022 U
				4/30/13	11	11.5	0.023 U
				4/30/13	17	17.5	0.03 U

TABLE 1
Summary of PCB Analytical Results

EPA PCB Self Implementing Plan
Werner Generating Station
South Amboy, New Jersey

AOC	AOC-ID - Description	Matrix	Sample ID	Sample Date	Sample Depth		Result
AOC-12A	Septic System in Northwest Corner of Site	soil	SB-12A-1	5/21/98	7	7.5	0.322
			SB-12A-2	5/21/98	4	4.5	4.1
			Duplicate	5/21/98	4	4.5	6.85
			SB-12A-2B	9/9/02	6	6.5	0.055
			SB-12A-3	5/21/98	5.5	6	3.1
				9/9/02	9	9.5	0.012 U
			SB-12A-4	9/10/02	4	4.5	0.15
			SB-12A-4	10/12/12	4.5	5	0.44
				10/12/12	7.5	8	0.02 U
			SB-12A-5	9/10/02	4	4.5	0.011 U
			SB-12A-6	9/10/02	4	4.5	0.013 U
			SB-12A-7	9/10/02	4	4.5	1.03
				10/12/12	7.5	8	0.026 U
			SB-12A-8A	9/9/02	4	4.5	3
			SB-12A-9	9/9/02	4	4.5	0.015 U
			SB2-12A-10	5/2/13	3.5	4	0.022 U
				5/2/13	7.5	8	0.028 U
			SB2-12A-13	5/2/13	3.5	4	0.14
				5/2/13	7.5	8	0.028 U
			SB2-12A-14	5/2/13	3.5	4	0.022 U
				5/2/13	7.5	8	0.021 U
AOC-12B	Septic System in Northwest Corner of Site, South of AOC-12A	soil	SB-12B-1	5/21/98	7	7.5	0.399
			SS-12B-2B	3/22/00	3.5	4	0 U
			SS-12B-3B	3/22/00	3.5	4	0 U
			SS-12B-4B	3/22/00	3.5	4	0 U
			SS-12B-5B	3/22/00	3.5	4	0 U
AOC-12C	Septic System Located Behind Electrical - Support Area	soil	SB-12C-1	5/27/98	7.5	8	0.1
			SB-12C-2	5/21/98	3.5	4	0.225
			SB-12C-3	5/27/98	3.5	4	0.046 U
			SS-12C-4B	3/22/00	3.5	4	0 U
			SS-12C-5B	3/22/00	3.5	4	0 U
AOC-13	Open Pipe Discharges	soil	SB-13-5	9/5/02	18	18.5	0.017 U
AOC-14A	Transformer and Circuit Breaker: CT#1	soil	SS-14A-1	3/20/00	0	0.5	0.72
				10/2/12	2	2.5	0.2
				10/2/12	4.5	5	0.23
			SS-14A-2A	3/20/00	0	0.5	0.7
			SS-14A-3A	3/20/00	0	0.5	0.1
			SS-14A-4A	3/20/00	0	0.5	1.33
			SS-14A-5A	3/20/00	0	0.5	3.85
			SS-14A-6	3/25/03	2	2.5	0.013
				3/25/03	6	6.5	0.015 U
			SS-14A-7A	8/15/02	1	1.5	0.19
			SS-14A-8	8/15/02	1	1.5	0.47
				10/2/12	2	2.5	0.016 U
			SS-14-1-1C	10/2/12	2	2.5	0.018 U
			SS-14-1-2	5/20/98	2	2.5	0.54
AOC-14B	Transformer and Circuit Breaker: CT#2	soil	SS-14B-1A	3/20/00	0	0.5	0.1
			SS-14B-2	3/20/00	0	0.5	0.4
				10/1/12	2	2.5	0.099
				10/1/12	4.5	5	0.018 U
			SS-14B-3A	3/20/00	0	0.5	0.2
			SS-14B-4A	3/20/00	0	0.5	0.6
			SS-14B-5	3/20/00	0	0.5	1.18
				10/9/12	3.5	4	0.018 U
			SS-14B-6	3/25/03	2	2.5	0.012
				3/25/03	4	4.5	0.014 U
			SS-14-2	5/20/98	0	0.5	0.77
				5/20/98	2	2.5	0.043
AOC-14C	Transformer and Circuit Breaker: CT#3	soil	SS-14C-1A	3/20/00	0	0.5	0.49
			SS-14C-2A	3/20/00	0	0.5	0.08
			SS-14C-3A	3/20/00	0	0.5	0.15
			SS-14C-4A	3/20/00	0	0.5	0.34
			SS-14C-5A	3/20/00	0	0.5	0.14
			SS-14-3	5/20/98	0	0.5	0.044
				5/20/98	2	2.5	0.053
AOC-14D	Transformer and Circuit Breaker: CT#4	soil	SS-14D-1A	3/20/00	0	0.5	0.242
			SS-14D-2A	3/20/00	0	0.5	0.072
			SS-14D-3	3/20/00	0	0.5	0.33
				10/9/12	2	2.5	0.019 U
				10/9/12	3.5	4	0.019 U
			SS-14D-4A	3/20/00	0	0.5	0.074
			SS-14D-5	10/9/12	2	2.5	0.018 U
				10/9/12	1.5	2	0.02
			SS-14D-6	9/5/02	3	3.5	0.062
				9/5/02	6	6.5	0.015 U
			SS-14-4	5/20/98	0	0.5	0.11
				5/20/98	2	2.5	0.112

TABLE 1
Summary of PCB Analytical Results

EPA PCB Self Implementing Plan
Werner Generating Station
South Amboy, New Jersey

AOC	AOC-ID - Description	Matrix	Sample ID	Sample Date	Sample Depth		Result
AOC-14E	Transformers: S of Transformer Oil Storage Tank (AOC-1F)	soil	SS-14E-1	3/16/00	0	0.5	0.79
				10/17/12	3.5	4	0.022 U
			SS-14E-2	3/16/00	0	0.5	0.33
				10/18/12	3.5	4	0.022 U
			SS-14E-3A	3/16/00	0	0.5	0.16
			SS-14E-4A	3/16/00	0	0.5	1
			SS-14E-5	3/16/00	0	0.5	0.26
				10/15/12	3.5	4	0.023 U
			SS-14E-6A	3/16/00	0	0.5	0.8
			SS-14E-7	3/16/00	0	0.5	0.29
				10/18/12	3.5	4	0.02 U
				10/18/12	7.5	8	0.022 U
			SS-14E-8	8/26/02	1	1.5	0.012
				3/25/03	4	4.5	0.016 U
			SS-14-12	5/21/98	0	0.5	0.335
				5/21/98	2	2.5	0.308
AOC-14F	Transformers: SW of AOC-14E	soil	SS-14F-1A	3/16/00	0	0.5	0.55
			SS-14F-2	3/16/00	0	0.5	0.98
				10/15/12	3.5	4	0.021 U
			SS-14F-3	3/16/00	0	0.5	0.39
				10/18/12	3.5	4	0.022 U
				10/18/12	7.5	8	0.022 U
			SS-14F-4A	3/16/00	0	0.5	0.82
			SS-14F-5B	8/26/02	1	1.5	0.047
AOC-14G	Transformers: SW of AOC-14F	soil	SS-14G-1	3/16/00	0	0.5	1.4
				10/15/12	3.5	4	0.021 U
				10/15/12	7.5	8	0.018 U
			SS-14G-2	3/16/00	0	0.5	2.1
				10/17/12	3.5	4	0.022 U
			SS-14G-3	3/16/00	0	0.5	1.5
				10/18/12	3.5	4	0.021 U
				10/18/12	7.5	8	0.022 U
			SS-14G-4A	3/16/00	0	0.5	0.65
			SS-14G-4B	10/17/12	3.5	4	0.022 U
			SS-14G-5A	3/16/00	0	0.5	0.78
			SS-14G-6	3/16/00	0	0.5	0.22
				10/15/12	3.5	4	0.016 U
			SS-14G-7	3/16/00	0	0.5	0.24
				10/17/12	3.5	4	0.022 U
			SS-14G-8	3/16/00	0	0.5	0.24
				10/17/12	3.5	4	0.021 U
			SS-14G-9A	8/16/02	1	1.5	0.011
			SS-14-1-0	5/20/98	0	0.5	0.38
			SS-14-8	5/20/98	0	0.5	0.149
				5/20/98	2	2.5	0.048 U
			SS-14-9-0	5/20/98	0	0.5	0.24
			SS-14-10	5/21/98	0	0.5	0.417
				5/21/98	2	2.5	0.318
AOC-14H	Transformer: Southwest of AOC-14G	soil	SS-14H-1A	3/16/00	0	0.5	0.78
			SS-14H-2A	3/16/00	0	0.5	0.85
			SS-14H-3A	3/16/00	0	0.5	0.081
			SS-14-7	5/20/98	0	0.5	0.113
				5/20/98	2	2.5	0.047 U
AOC-14I	Transformer: Southwest of AOC-14H	soil	SS-14I-1A	3/20/00	0	0.5	0.086
			SS-14I-2A	3/20/00	0	0.5	0.31
			SS-14-6-1	5/20/98	0.5	1.3	0.391
AOC-14J	Transformer: Southwest of AOC-14I	soil	SS-14J-1A	3/21/00	0	0.5	0.08
			SS-14J-2A	3/21/00	0	0.5	0.084
			SS-14J-3A	3/21/00	0	0.5	0.091
			SS-14-5	5/20/98	0	0.5	0.037
				5/20/98	2	2.5	0.046 U
AOC-14K	Transformer/Circuit Breakers in 34.5kV Substation	soil	SS-14K-1	10/18/12	3.5	4	0.021 U
				10/18/12	7.5	8	0.022 U
			SS-14K-2A	3/21/00	0	0.5	0.52
			SS-14K-3	3/21/00	0	0.5	0.62
				10/18/12	3.5	4	0.21
				10/18/12	7.5	8	0.023 U
			SS-14K-4A	3/21/00	0	0.5	0.13
			SS-14K-5	3/21/00	0	0.5	0.27
				10/18/12	3.5	4	0.02 U
			SS-14K-6	3/21/00	0	0.5	0.51
				10/18/12	3.5	4	0.022 U
			SS-14K-7	3/21/00	0	0.5	0.43
				10/18/12	3.5	4	0.02 U
			SS-14K-8A	3/21/00	0	0.5	0.08
			SS-14K-9	9/16/02	4	4.5	0.015 U
				10/11/12	0	0.5	0.018
			SS-14K-10A	8/16/02	1	1.5	0.087
			SS-14K-11A	8/16/02	1	1.5	0.057
			SB-34.5-1	10/12/12	5	5.5	0.017 U
				10/12/12	7.5	8	0.019 U

TABLE 1
Summary of PCB Analytical Results

EPA PCB Self Implementing Plan
Werner Generating Station
South Amboy, New Jersey

AOC	AOC-ID - Description	Matrix	Sample ID	Sample Date	Sample Depth		Result
AOC-14L	Former Substation Area	soil	SS-14L-1A	4/19/00	1.5	2	0.086
			SS-14L-2A	4/19/00	1.75	2.25	0 U
			SS-14L-3A	4/19/00	1.75	2.25	0 U
			SS-14L-4A	4/19/00	2	2.5	0 U
AOC-16O	Area of Discharge/Spill – 12/29/00 (NJDEP Case No. 00-12-9-1500-24)	soil	SS-160-1	9/17/02	1	1.5	0.081
			SS-160-2	9/17/02	1	1.5	0.053
			SS-160-3	9/17/02	1	1.5	0.047
			SS-160-4	9/17/02	1	1.5	0.057
			SS-160-5	9/17/02	1	1.5	0.039
AOC-20	Power Plant Building	soil	**SB-20-1A**	**2/4/16**	0	0.5	0.01 U
			SB-20-2A	**2/4/16**	0	0.5	0.012 U
			SB-20-3A	**2/4/16**	0	0.5	0.01 U
			SB-20-4A	**2/4/16**	0	0.5	0.01 U
			SB-20-5A	**2/4/16**	0	0.5	0.3
			SB-20-6A	**2/4/16**	0	0.5	0.011 U
		concrete chip	**CS-20-1**	**9/26/16**	0	0.02	0.0092 U
			CS-20-2	**9/26/16**	0	0.02	0.52
			CS-20-3	**9/26/16**	0	0.02	2.5
			CS-20-4	**9/26/16**	0	0.02	10
			CS-20-5	**9/26/16**	0	0.02	0.95
			CS-20-6	**9/26/16**	0	0.02	0.25
			CS-20-7	**9/26/16**	0	0.02	0.13
			CS-20-8	**9/26/16**	0	0.02	0.50
			CS-20-9	**9/26/16**	0	0.02	2.4
			CS-20-10	**9/26/16**	0	0.02	0.87
AOC-22	CT #1	concrete chip	CS-22-1	10/30/2019	0	0.02	0.37
			CS-22-2	10/30/2019	0	0.02	0.5
			CS-22-3	10/30/2019	0	0.02	0.18
			CS-22-4	10/30/2019	0	0.02	0.74
			CS-22-5	10/30/2019	0	0.02	0.59
	CT #2	concrete chip	CS-22-6	10/30/2019	0	0.02	0.68
			CS-22-7	10/30/2019	0	0.02	0.65
			CS-22-8	10/30/2019	0	0.02	0.064 U
			CS-22-9	10/30/2019	0	0.02	1.6
			CS-22-10	10/30/2019	0	0.02	1
	CT #3	concrete chip	CS-22-11	10/30/2019	0	0.02	0.31
			CS-22-12	10/30/2019	0	0.02	1.6
			CS-22-13	10/30/2019	0	0.02	0.078 J
			CS-22-14	10/30/2019	0	0.02	2.2
			CS-22-15	10/31/2019	0	0.02	0.87
	Ct #4	concrete chip	CS-22-16	10/31/2019	0	0.02	0.44
			CS-22-17	10/31/2019	0	0.02	0.73
			CS-22-18	10/31/2019	0	0.02	0.082 J
			CS-22-19	10/31/2019	0	0.02	1.1
			CS-22-20	10/31/2019	0	0.02	0.8
AOC-25	Drainage Structure North of CT Unit No. 4	soil	SB-25-1A	10/3/12	7.5	8	0.022 U
			SB-25-2A	10/2/12	7.5	8	0.018 U
			SB-25-3A	10/2/12	7.5	8	0.3
			SB-25-4C	10/4/12	8	8.5	0.019 U
AOC-26	American Agricultural Chemical Company Area	soil	SB-26-1	3/26/03	1	1.5	0.011
			SB-26-2	3/26/03	1	1.5	0.012
			SB-26-3	3/26/03	1	1.5	0.012
			SB-26-4	3/26/03	1	1.5	0.011
			SB-26-5	3/26/03	1	1.5	0.012

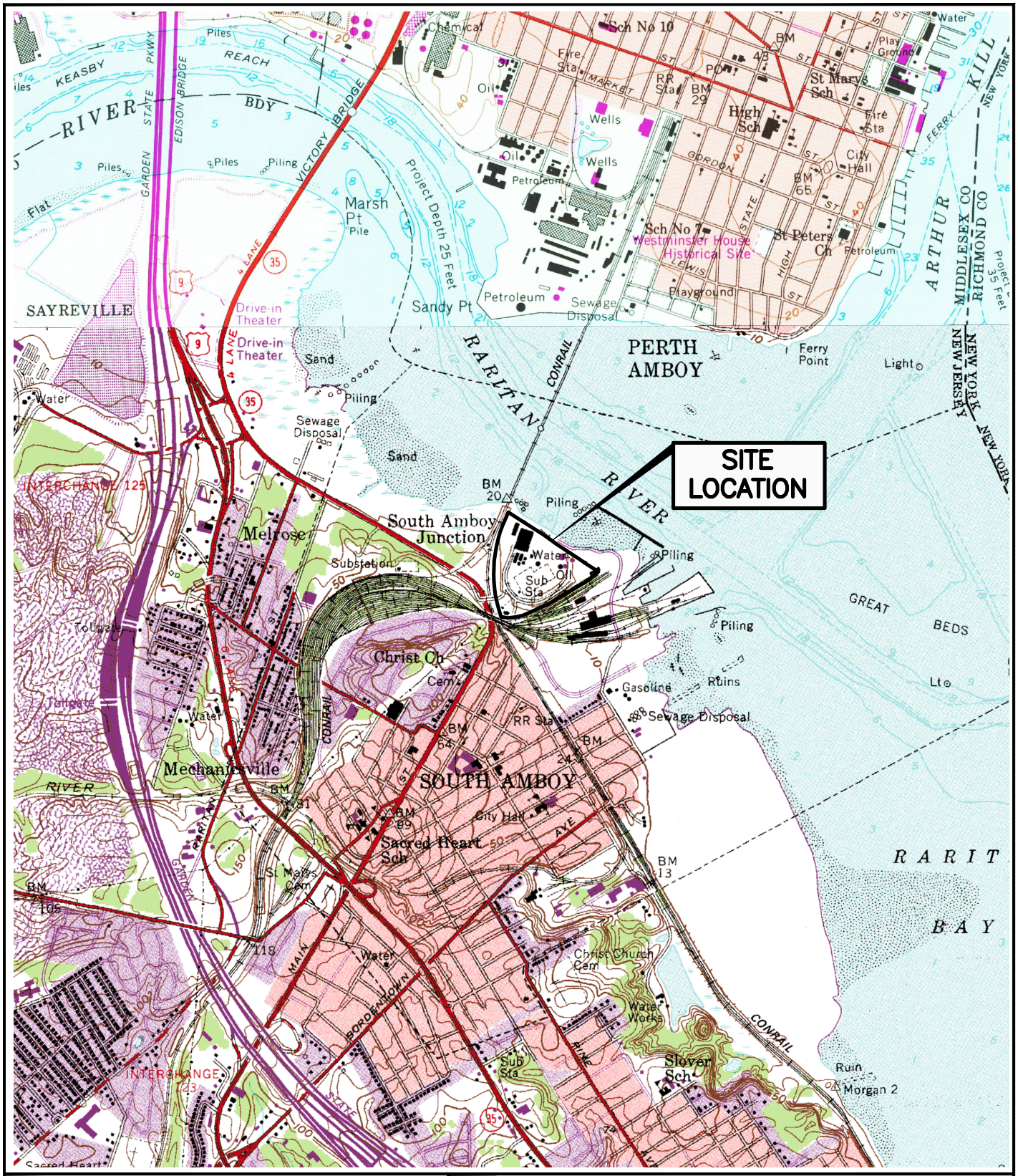
TABLE 1
Summary of PCB Analytical Results

EPA PCB Self Implementing Plan
Werner Generating Station
South Amboy, New Jersey

AOC	AOC-ID - Description	Matrix	Sample ID	Sample Date	Sample Depth		Result
Soil Samples Not Associated with a Particular AOC	unknown	Soil	SB-WB-1	5/2/13	0	0.5	0.021
				5/2/13	3.5	4	0.021 U
				5/2/13	7.5	8	0.032 U
			SB-WB-2	5/2/13	0	0.5	0.022
				5/2/13	3.5	4	0.025 U
				5/2/13	7.5	8	0.031 U
			SB-WB-3	5/9/13	0	0.5	0.021
				5/9/13	3.5	4	0.021 U
				5/9/13	7.5	8	0.023 U
			SOIL-1	8/26/02	1	1.5	0.014
				8/26/02	5	5.5	0.015 U
			SOIL-2	8/26/02	2	2.5	0.015
				8/26/02	5	5.5	0.016 U
			SOIL-3	8/26/02	1	1.5	0.47
				8/26/02	5	5.5	0.012 U
			SOIL-4	9/10/02	6	6.5	0.011 U
			SCW-1	9/24/12	7	7.5	0.051 U
			SCW-10	9/24/12	5.5	6	0.049 U
			SCW-11	9/24/12	4.5	5	0.043 U
			SCW-12	9/24/12	6.5	7	0.044 U
			SCW-13	9/25/12	3.5	4	0.042 U
			SCW-14	9/25/12	1	1.5	0.15
			SCW-15	9/25/12	5.5	6	0.055 U
			SCW-16	9/25/12	5.5	6	0.054 U
			SCW-17	9/25/12	6.5	7	0.056 U
			SCW-2	9/24/12	5.5	6	0.089
			SCW-3	9/24/12	6.5	7	0.056 U
			SCW-4	9/24/12	7	7.5	0.062 U
			SCW-5	9/24/12	5.5	6	0.046 U
			SCW-6	9/24/12	7	7.5	0.056 U
			SCW-7	9/24/12	6.5	7	0.056 U
			SCW-8	9/24/12	1.5	2	0.042
			SCW-9	9/25/12	3.5	4	0.16
			SS-MH-7C	9/28/12	3.5	4	0.21

Notes:

2.2	Indicates the PCB concentration is greater than 1 mg/kg
1.1	Indicates the PCB concentration is at 1 mg/kg when rounded.



0 2000 4000

SCALE (FEET)

N

MAP SOURCE:

U.S.G.S. 7.5 MINUTE SERIES QUADRANGLE OF SOUTH AMBOY, N.J.–N.Y., DATED 1954, PHOTOREVISED 1981.

U.S.G.S. 7.5 MINUTE SERIES QUADRANGLE OF PERTH AMBOY, N.J.–N.Y., DATED 1956, PHOTOREVISED 1981.

SITE LOCATION MAP.
E.H. WERNER GENERATING STATION
REMEDIAL INVESTIGATION/REMEDIAL ACTION WORK PLAN
SOUTH AMBOY, NEW JERSEY

AECOM
CLIFTON, NEW JERSEY

DR. BY	ET	SCALE	AS SHOWN	DWG. NO.2017_RAWP FIG.01	PROJ. NO. 11130947
CK'D. BY	CB	DATE	JANUARY, 2014	FIG. NO.	1

File Name: M:\Cadd\WERNER\2017-RAWP-WERNER\2017-RAWP-Aecom\2017_RAWP FIG 01_SiteLocMap.dwg User:Eva.Tucewicz Dec 12, 2018 - 2:45pm

Approximate Sea Streak Area

Figure 2A Extents

Former Power Plant Building (AOC 20)

Former CT area (AOC 22)

American Agricultural Chemical Company

Former Graver House (AOC 7A)

34.5 kV Substation (AOC 14K)

Figure 2B Extents

Former 69 kV Substation (AOC 14L)

230 kV Substation

Legend

- PCB Samples Above Standard
- PCB Samples Below Standard
- Lot 26.02 (to be transferred)
- Project Area

Map Extent

N
W E
S

0 55 110 Feet

Sitewide PCB Results
Werner Generating Station
Main Street, South Amboy, New Jersey

PROJECT NUMBER	60410251
DATE	1/16/2020
FIGURE NUMBER	2

Map Source:
New Jersey 2015 High Resolution Orthophotography.
Web Map Service (WMS), NJIT, OGIS.
http://njwebmap.state.nj.us/njimagery, 2015

AECOM
Clifton, New Jersey

Chem Box Key

Sample Name	Sample Start Depth (ft bgs)	Sample End Depth (ft bgs)	Sample Date	Sample PCB Result

Legend

- PCB Samples Above Standard
- PCB Samples Below Standard
- MatchLines
- Lot 26.02 (to be transferred)
- Project Area

MATCHLINE FIGURE 2B

Map Extent

N
W E
S

0 25 50 Feet

Sitewide PCB Results - North
Werner Generating Station
Main Street, South Amboy, New Jersey

PROJECT NUMBER: 60410251

DATE: 1/16/2020

FIGURE NUMBER: 2A

Map Source:
New Jersey 2015 High Resolution Orthophotography.
Web Map Service (WMS). NJIT, OGIS.
http://njwebmap.state.nj.us/njimagery, 2015

AECOM
Clifton, New Jersey

Chem Box Key				
Sample Name	Sample Start Depth (ft bgs)	Sample End Depth (ft bgs)	Sample Date	Sample PCB Result

Legend

- PCB Samples Above Standard
- PCB Samples Below Standard
- Mapsheet Matchline
- Lot 26.02 (to be transferred)
- Project Area

MATCH LINE FIGURE 2A

Map Extent

N
W E
S

0 25 50 Feet

Sitewide PCB Results - South
Werner Generating Station
Main Street, South Amboy, New Jersey

PROJECT NUMBER: 60410251

DATE: 1/16/2020

FIGURE NUMBER: 2B

Map Source:
New Jersey 2015 High Resolution Orthophotography,
Web Map Service (WMS), NJIT, OGIS,
http://njwebmap.state.nj.us/njimagery, 2015

AECOM
Clifton, New Jersey